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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

JULIE FILAMORE-ANGEL,

Plaintiff,

Case No. 3:14-cv-01278-JE

v.

**PROVIDENCE HEALTH & SERVICES -
OREGON, d.b.a, PROVIDENCE ST.
VINCENT MEDICAL CENTER,**

Defendant.

**DECLARATION OF ANDRALENE
ALLEN IN SUPPORT OF DEFENDANT'S
MOTION FOR SUMMARY JUDGMENT**

I, Andralene Allen, depose and say as follows:

1. At all material times herein, Providence Health & Services – Oregon (“Providence”) has employed me as a Senior Human Resources Consultant. I have personal knowledge of the facts recited herein.

1 – Declaration of Andralene Allen


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2. One of the job responsibilities of Providence's Senior Human Resources Consultants is to assist in responding to administrative complaints against Providence filed with the Oregon Bureau of Labor and Industries ("BOLI"). Providence's records show that on or around January 29, 2013, BOLI mailed Providence notice of an administrative complaint filed by Edith Roberts, who Providence had employed as a registered nurse.

3. On or around November 4, 2013, BOLI mailed Providence notice of an administrative complaint filed by Julie Filamore Angel, a Providence Mental Health Associate. Ms. Filamore Angel alleged in her complaint that Providence had retaliated against her because BOLI had interviewed her as a witness in the complaint filed by Ms. Roberts. BOLI dismissed Ms. Filamore Angel's complaint.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED on this 29th day of July, 2015.



Andralene Allen

2 – Declaration of Andralene Allen

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I hereby certify that I served the foregoing **Declaration of Andralene Allen** on:

Eric J. Fjelstad
Smith & Fjelstad
722 N. Main Ave.
Gresham, OR 97030
503-669-2242

Attorney for Plaintiff

by the following indicated method or methods:

- ☐ by **mailing** a full, true, and correct copy thereof in a sealed, first-class postage-prepaid envelope, addressed to the attorney as shown above, the last-known office address of the attorney, and deposited with the United States Postal Service at Portland, Oregon, on the date set forth below.
- ☒ by **electronic filing** with the District Court's CM/ECF system.
- ☐ by sending a full, true, and correct copy thereof via **overnight courier** in a sealed, prepaid envelope, addressed to the attorney as shown above, the last-known office address of the attorney, on the date set forth below.
- ☐ by **faxing** a full, true, and correct copy thereof to the attorney at the fax number shown above, which is the last-known fax number for the attorney's office on the date set forth below.

Dated this 30th day of July 2015.



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Attorney for Defendant

1 – Certificate of Service